

EXHIBIT “J”

Jul. 12, 2016 2:17PM

Vc. 0399 P. 27

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

SHAWNTEL BREED, INDIVIDUALLY
AND AS REPRESENTATIVE OF THE
ESTATE OF DUSTIN KEITH JONES,
DECEASED AND AS NEXT FRIEND OF
DUSTIN JONES AND CENIYA JONES,
MINOR CHILDREN

VS.

CITY OF KIRBYVILLE, CHIEF PAUL
BRISTER, AND OFFICER JOSH
HANCOCK OF THE CITY OF
KIRBYVILLE POLICE DEPARTMENT,
INDIVIDUALLY AND IN THEIR
OFFICIAL CAPACITIES

CIVIL ACTION NO. 1:15-cv-00190

**DEFENDANT, CITY OF KIRBYVILLE'S
RESPONSE TO PLAINTIFF'S SECOND REQUEST FOR PRODUCTION**

TO: Plaintiffs, SHAWNTEL BREED, INDIVIDUALLY AND AS REPRESENTATIVE OF THE ESTATE OF DUSTIN KEITH JONES, DECEASED AND AS NEXT FRIEND OF DUSTIN JONES AND CENIYA JONES, MINOR CHILDREN, by, and through their attorney of record, Mr. Ronnie Turner, Jr., Provost Umphrey Law Firm, L.L.P., 490 Park Street, Beaumont, TX 77704

COMES NOW, CITY OF KIRBYVILLE, Defendant in the above-styled and numbered cause of action, and pursuant to the Rules of Civil Procedure, files this its Response to Plaintiffs' Second Request for Production on file herein. These Responses are made subject to such objections as shall be urged before the trial of this cause, and the Responses are following.

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Respectfully submitted,

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By:


Frank D. Calvert
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ATTORNEYS FOR DEFENDANTS,
CITY OF KIRBYVILLE, CHIEF PAUL
BRISTER, AND OFFICER JOSH HANCOCK
OF THE CITY OF KIRBYVILLE POLICE
DEPARTMENT, INDIVIDUALLY AND IN
THEIR OFFICIAL CAPACITIES

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was furnished to all counsel of record by:

XX By Telefacsimile

on this 12th day of July, 2016.


Frank D. Calvert

Jul. 12, 2016 2:08PM

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**CITY OF KIRBYVILLE'S RESPONSE TO PLAINTIFF'S
SECOND REQUEST FOR PRODUCTION**

REQUEST 16: Any and all audio recordings of any type made of the conversations between defense counsel and witness Krissy Thomas-Adams made or recorded prior to her signing her affidavit dated April 28, 2016. Specifically including the audio recording mentioned in Krissy Thomas-Adams' deposition at 70:12-71:8.

RESPONSE:

None.

REQUEST 17: Any and all audio recording devices of any type used to record the conversations between defense counsel and witness Krissy Thomas-Adams made or recorded prior to her signing her affidavit dated April 28, 2016. Specifically including the audio recording mentioned in Krissy Thomas-Adams' deposition at 70:12-71:8.

RESPONSE:

None.

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Ne. 0399 P. 1

CALVERT EAVES CLARKE & STELLY, L.L.P.
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DATE: July 12, 2016

TO: Mr. Ronnie Turner, Jr.
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RE: City of Kirbyville's Answers to Discovery

FROM: Frank Calvert/cdf

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